

## Montana Consumer Counsel

Robert A. Nelson

Consumer Counsel

Frank E. Buckley, *Rate Analyst*John B. Bushnell, *Economist*Thomas S. Muri, *Attorney*Celia Farlan, *Secretary*FILED  
OFFICE OF THE SECRETARY  
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October 18, 2000

Mr. David P. Boergers, Acting Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington DC 20426

Re: Montana Power Company  
Docket No. RT01-354000

Dear Mr. Boergers,

Enclosed are the original and 14 copies of the Montana Consumer Counsel's Motion to Intervene in the above docket.

Sincerely,

Celia Farlan,  
Secretary

cc: Service list w/enclosure

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UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

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Avista Corporation, )  
)  
Bonneville Power Administration, )  
)  
Idaho Power Company, )  
)  
Montana Power Company, )  
)  
Nevada Power Company, )  
)  
PacifiCorp, )  
)  
Portland General Electric Company, )  
)  
Puget Sound Energy, Inc., )  
)  
Sierra Pacific Power Company )

Docket No. RT01-35/000

MOTION OF  
THE MONTANA CONSUMER COUNSEL  
TO INTERVENE

Pursuant to Rules 211 and 214 of the Federal Energy Regulatory Commission's Rules of Practice and Procedure, 18 C.F.R. 385.211 and 385.214, the Montana Consumer Counsel (MCC) hereby moves for leave to intervene in this docket. In support thereof, MCC states as follows:

## I.

Notices and communications regarding this matter should be sent to:

Robert A. Nelson  
Montana Consumer Counsel  
PO Box 201703  
616 Helena Avenue  
Helena MT 59620-1703

## II.

The office of the MCC is a constitutional agency of the State of Montana. (Montana Constitution, Article XIII, Section 2.) The MCC is statutorily charged with representing the public consumers of utility services in the State of Montana.

Section 69-2-202(2), Montana Code Annotated, provides:

The consumer counsel may institute, intervene in, or otherwise participate in appropriate proceedings in the state and federal courts and administrative agencies in the name of and on behalf of the utility and transportation consuming public of the state of Montana or substantial elements thereof, including review of decisions rendered by or failure to act by the commission and applications for restraining orders pending the investigation of and decision upon a matter by the commission, pursuant to 27-19-203.

## III.

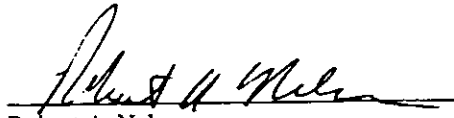
The transmission services of the applicant companies are a significant concern to electricity users in Montana.

## IV.

MCC's intervention is in the public interest.

The MCC respectfully requests leave to intervene and to participate as a party in this proceeding.

Respectfully submitted October 18, 2000,

A handwritten signature in black ink, appearing to read "Robert A. Nelson", is written over a horizontal line.

Robert A. Nelson  
Montana Consumer Counsel  
PO Box 201703  
616 Helena Avenue  
Helena MT 59620-1703

CERTIFICATE OF SERVICE

I hereby certify that I have this 18th day of October, 2000, served the foregoing Motion of the Montana Consumer Counsel to Intervene upon the following persons in accordance with the requirements of Section 385.2010 of the revised rules of practice and procedure.

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Celia Farlan, Secretary